Case: 4:19-cr-00195-RLW Doc. #: 5 Filed: 03/06/19 Page: 1 of 2 PageID #: 7

17-18 E

FILED

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

MAR - 6 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,	)	
Plaintiff,		
vs.	No. 4:19CR00195 RLW/NA	B
ANTOINE MILLER,		
Defendant.		

## MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Steven A. Muchnick, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

- Defendant is charged with one count of felon in possession of a firearm, in violation of
   U.S.C. § 922(g)(1).
- 2. Pursuant to Title 18, United States Code, Section 3142(g),
  - (a) the weight of the evidence against defendant;
  - (b) defendant's history and characteristics; and
  - (c) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.

- 3. There is a serious risk that the defendant will flee.
- 4. The defendant is a threat to the community.
- 5. There is a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness or juror.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

(314) 539-2200

JEFFREY B. JENSEN UNITED STATES ATTORNEY

/s/Steven A. Muchnick
STEVEN A. MUCHNICK – 27597MO
ASSISTANT UNITED STATES ATTORNEY
Thomas F. Eagleton Courthouse
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102